



State of Utah

Department of
Environmental Quality

Richard W. Sprott
Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0100810005-08

March 14, 2008

Bill Lawson
PacifiCorp Energy
1407 West North Temple
Salt Lake City, Utah 84116

Dear Mr. Lawson:

Re: Intent to Approve: Notice of Intent for Fly Ash Handling Equipment at the Carbon Plant, Carbon County – CDS A; ATT; Title V MAJOR
Project Code: N010081-0005

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any questions you may have on this project to Mr. John Jenks. He may be reached at (801) 536-4459.

Sincerely,

Ty Howard, Manager
New Source Review Section

TH:JJ:kw

cc: Southeastern Utah District Health Department

Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Notice of Intent for
Fly Ash Handling Equipment at the Carbon Plant**

**Prepared By: John Jenks, Engineer
(801) 536-4459
Email: jjenks@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0100810005-08

Date: March 14, 2008

PacifiCorp Energy

**Source Contact
Harold Cunningham
(435) 472-7295**

**M. Cheryl Heying
Executive Secretary
Utah Air Quality Board**

Abstract

PacifiCorp Energy has submitted a notice of intent (NOI) to upgrade the fly ash removal system at its Carbon Plant located in Carbon County. This area is attainment for the National Ambient Air Quality Standards (NAAQS) for all pollutants. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT) regulations do not apply to this modification, although Title V of the 1990 Clean Air Act does apply to this source. The Title V operating permit for this source shall be amended prior to the operation of the approved modifications.

There will be an estimated 0.15 tons per year increase in PM_{10} emissions. This results in a total potential to emit for PM_{10} of 2.25 tons per year.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Sun Advocate on March 18, 2008. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This AO applies to the following company:

Facility Office

Carbon Plant
P.O. Box 839
Helper, UT 84526

Phone Number: (435) 472-3493
Fax Number: (435) 472-7203

Corporate Office Location

PacifiCorp Energy
1407 West North Temple, Suite 270
Salt Lake City, UT 84140

(801) 220-2353
(801) 220-4307

The equipment listed below in this AO shall be operated at the following location:

PLANT LOCATION:

Approximately three miles north of Helper at the intersection of Highway 6 and 191 in Carbon County

Universal Transverse Mercator (UTM) Coordinate System - NAD27:
4,397.3 kilometers Northing; 511.6 kilometers Easting; Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
3. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
4. All records referenced in this AO or in applicable NSPS and/or NESHAP and/or MACT standards, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for a minimum of five (5) years.
5. PacifiCorp Energy (PacifiCorp) shall install and operate the fly ash collection systems and fly ash storage silos for Units #1 and #2 in accordance with the terms and conditions of this AO, which was written pursuant to PacifiCorp's Notice of Intent submitted to the Division of Air Quality (DAQ) on October 10, 2007 and additional information submitted to the DAQ on January 9, 2008.
6. This AO shall replace the following two AOs:
 - A. DAQE-082-98 dated February 2, 1998
 - B. BAQE-055-89 dated March 23, 1989
7. The approved installations shall consist of the following equipment or equivalent*:
 - A. Emission Source 14a - North Fly Ash Storage Silo Bin Vent Filter
 - B. Emission Source 29 - North Silo Fly Ash Removal System for Units #1 and #2
 - C. Emission Source 14b - South Fly Ash Storage Silo Bin Vent Filter
 - D. Emission Source 29a - South Silo Fly Ash Removal System for Units #1 and #2

* Equivalency shall be determined by the Executive Secretary.
8. PacifiCorp shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #7 has been completed and is operational. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section. If the construction and/or installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the construction and/or installation. At that time, the Executive Secretary shall require documentation of the continuous construction and/or installation of the operation and may revoke the AO in accordance with R307-401-18.

Limitations and Test Procedures

9. Visible emissions from any stationary point or fugitive emission source associated with the sources or control facilities listed in Condition #7 shall not exceed 10% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.
10. PacifiCorp shall abide by all applicable requirements of R307- 205 for Fugitive Emission and Fugitive Dust sources.

Records & Miscellaneous

11. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.
12. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
13. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

Ty Howard, Manager
New Source Review Section